

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

In re:	)	Case No. 18-33826
	)	
Taniel Patrice Sanders,	)	Adversary Proceeding No. 19-03008
	)	
Debtor,	)	Chapter 7
<hr style="width:30%; margin-left:0;"/>	)	
	)	Judge John P. Gustafson
Taniel Patrice Sanders,	)	
	)	<b><u>PLAINTIFF'S MOTION TO DISMISS</u></b>
Plaintiff,	)	<b><u>ADVERSARY PROCEEDING</u></b>
	)	<b><u>WITHOUT PREJUDICE</u></b>
v.	)	
	)	Joseph E. Stanford (0096581)
FedLoan Servicing, et al.	)	Legal Aid of Western Ohio, Inc.
	)	525 Jefferson Ave., Suite 400
Defendant(s).	)	Toledo, Oh 43604-1094
	)	Telephone: 419-930-2526
	)	Fax: 419-321-1582
	)	Email: <a href="mailto:jstanford@lawolaw.org">jstanford@lawolaw.org</a>
	)	
		<i>Attorney for Plaintiff Taniel Sanders</i>

Now comes Plaintiff/Debtor, Taniel Patrice Sanders, by and through her attorney, Joseph E. Stanford, and respectfully moves this Court to dismiss without prejudice the above referenced adversary proceeding with each party to bear their respective costs and attorneys' fees.

**CERTIFICATE OF SERVICE**  
**AND NOTICE PURSUANT TO LOCAL RULE 9013-1**

Please take note that the Respondent(s) have fourteen (14) days from service of this Motion to file and serve a response or a request for a hearing, and that if a response or request is not timely filed with the court and served on the Movant c/o Joseph Stanford, 525 Jefferson Ave, Suite 400, Toledo, OH 43604 the Court may grant the relief requested without hearing.

We hereby certify that, on February 3, 2020, a true and correct copy of the foregoing *Plaintiff's Motion to Dismiss Adversary Proceeding Without Prejudice* was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

United States Trustee (Registered address)@usdoj.gov

Guillermo J. Rojas on behalf of Defendant U.S. Department of Education, Defendant Attorney General of the United States and Defendant US Attorney  
[Guillermo.Rojas@usdoj.gov](mailto:Guillermo.Rojas@usdoj.gov) [lorraine.riston@usdoj.gov](mailto:lorraine.riston@usdoj.gov) [dixie.racklyeft@usdoj.gov](mailto:dixie.racklyeft@usdoj.gov)  
[rowenda.dellisanti@usdoj.gov](mailto:rowenda.dellisanti@usdoj.gov)

I further certify that, on February 3, 2020 or on the next business day thereafter, a copy of the foregoing *Plaintiff's Motion to Dismiss Adversary Proceeding Without Prejudice* was served by regular U.S. mail, postage prepaid, on:

FedLoan Servicing, 1200 N. 7th St, Harrisburg, PA 17106-9184

Pennsylvania Higher Education Assistance, 1200 N 7th St, Harrisburg, PA 17102-1444

s/ Joseph E. Stanford  
Joseph E. Stanford  
Attorney for Plaintiff